

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RICHARD L. RIVERA QUINONES

Debtor(s)

CASE NO. 07-02538 SEK

CHAPTER 7

APPLICATION FOR LEAVE TO EMPLOY REALTOR
PURSUANT TO RULE 2014 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE

TO THE HONORABLE COURT:

COMES NOW, **Wilfredo Segarra Miranda**, Trustee in the present case, who respectfully states and prays relief as follows:

1. Applicant is the duly appointed trustee in the above-captioned proceeding.
2. The undersigned trustee seeks to employ realtors **Zunilda Cabrera Jiménez**, license number 304 and **Pedro Betancourt Diaz**, license number 8416, to procure the sale of a real property pertaining to the herein estate.
3. In the undersigned trustee's best business judgment, aggressive marketing efforts, as those agreed and to be provided by **Zunilda Cabrera Jiménez** and **Pedro Betancourt Diaz**, may yield a feasible offer and realizable value for these properties within the valuation estimates obtained as of this date.
4. Within the services to be provided, **Zunilda Cabrera Jiménez** and **Pedro Betancourt Diaz** should be in charge of all selling and marketing efforts and will conduct the sale of the properties in accordance with the notice of sale filed and noticed to all creditors and parties in interest.

5. To the best of the trustee's knowledge, the realtors whose employment is sought have no connection with the undersigned trustee, the Debtor, the creditors, any parties in interest, their respective attorneys or accountants, and the office of the US Trustee or any person employed by said office
6. Your trustee further believes that in the discharge of its duties the firm will not represent or hold any interest adverse to the herein estate and will be a disinterested person as defined in 11 U.S.C. §101(14) & §327.
7. The proposed realtors will be paid for its services as follows:
 - a. **Zunilda Cabrera Jiménez and Pedro Betancourt Diaz** will receive a real estate broker commission at the rate of 4% of the gross sales price on the private offers and sales procured by his services. This commission is to be paid by the estate, after notice hearing and allowance by the Court.
 - b. Any forfeited commission will be shared fifty per cent to the estate and fifty per cent to the realtors. This commission is to be paid by the estate from the forfeited moneys, after notice hearing and allowance by the Court.

NOTICE IS HEREBY GIVEN that, unless a written objection is filed in Court, within ten (10) days of this Notice, the Court may enter an Order granting the application for employment of these realtors without the need of a hearing.

WHEREFORE, undersigned Chapter 7 Trustee hereby requests the entry of an Order granting leave to employ **Zunilda Cabrera Jiménez and Pedro Betancourt Diaz**, to act as Realtors for the Trustee in the present Chapter 7 proceeding on the terms detailed herein.

CERTIFICATE OF SERVICE: I HEREBY CERTIFY THAT on the same date a true copy of this motion has been sent to the **US Trustee Office** at Ochoa Building, 500 Tanca Street, Suite 301, Old San Juan, Puerto Rico 00901-1922 and to all other creditors and parties in interest included in the attached master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of December, 2008.

/s/wilfredo segarra miranda
WILFREDO SEGARRA MIRANDA
CHAPTER 7 TRUSTEE
PO Box 9023385
San Juan, PR 00902-338
Tel. (787) 725-6160
Fax (787) 977-2288

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RICHARD L. RIVERA QUINONES

Debtor(s)

CASE NO. 07-02538 SEK

CHAPTER 7

VERIFIED DECLARATION UNDER PENALTY OF PERJURY

TO THE HONORABLE COURT:

We, Zunilda Cabrera Jiménez, license number 304, and Pedro Betancourt Diaz, license 8416, declare under penalty of perjury as follows:

1. We are a Realtors duly authorized to exercise our professions of Realtors by the laws of the Commonwealth of Puerto Rico. The exercise of said licenses have in no way been restricted or limited.
2. We maintain offices at #140 Vereda St., Paseo del Prado, Carolina, Puerto Rico, 00987, telephone 787-547-6521; 787-547-6514.
3. Prior to the date of the applicants engagement as realtor, we had no connections with debtor, debtor's attorney, creditor, US Trustee, Chapter 7 Trustee or any other party in interest.
4. That to the best of our knowledge and belief, we are "disinterested persons" as per Section 101(14) of the Bankruptcy Code, which definition is incorporated herein by reference, and we do not have any connection to any creditor or debtor in this case, nor any party in interest herein, nor anyone acting on their behalf whose interest may be adverse to debtor's estate, and we do not represent or hold any interest adverse to the debtor or to the estate,

with respect to the matter on which it is to be employed as counsel, pursuant to 11 U.S.C. §327(a).

5. We have not received or been promised transfer, assignment, pledge of property of the debtor or the estate, except as for compensation as set forth herein to be made at no more of 4% of the gross sales price.
6. I have not agreed to share with any person, except members of my Firm, the compensation to be paid for the services rendered in this case.
7. The terms of compensation agreed to are as follows: no more of 4% of the gross sales price.
8. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto.
9. I have reviewed the provisions of LBR 2016-1.

In San Juan, Puerto Rico, this 19th day of December, 2008.



ZUNILDA CABRERA JIMÉNEZ
Via 9 2 LL, 331
Villa Fontana
Carolina, Puerto Rico
Tel. (787) 547-6514
Fax (787) 750-8818



PEDRO BETANCOURT DIAZ
Via 9 2 LL, 331
Villa Fontana
Carolina, Puerto Rico
Tel. (787) 547-6521
Fax (787) 750-8818

Calle Vereda 140 Phone: 787.547.6521
Paseo del Prado, Fax: 787.750.8818
Carolina, PR 00987 Email:zuped@hotmail.com

Pedro Betancourt Díaz

Experience 1999–2001 Eagle Realty Carolina, PR
Real Estate Broker

Since 2001 BC Properties Carolina, PR
President

Education **Instituto de Banca y Comercio** 1994
Restaurant administration

San Juan Board of Realtors 1998
Real Estate Broker Course (Lic. 8416)

Related education

Instituto Prof. José R. Faría 2000
Regulations 10 Law Course
Ethics Regulations Course

San Juan Board of Realtors
Documentation for closing and legal aspects Course

San Juan Board of Realtors 2002
Valuation Analysis Course

Instituto Prof. José R. Faría 2003
Mathematics for Real Estates Course
Sales Techniques Course
Mortgage Financing Course

San Juan Board of Realtors
Financing of commercial properties Course

San Juan Board of Realtors 2004
Legal Aspects Course
Mortgage Financing Course
Venta de Propiedades Bajo Ley de Quiebra Course

San Juan Board of Realtors 2005
Ventas de Propiedades Reposeidas Course

Instituto de Realtors de Puerto Rico 2006
New apartment valuation and valuation analysis Course

San Juan Board of Realtors
Sales Techniques Course

Instituto de Realtors de Puerto Rico 2007
Regulations 10 Law Course
Venta de Propiedades Fuera de Puerto Rico Course
Mathematics for Real Estates Course

Asociación de Realtors
Computers Techniques for Real Estates Course

Calle Vereda 140 Phone: 787.547.6514
Paseo del Prado, Carolina Fax: 787.750.8818
PR, 00987 Email:zuped@hotmail.com

Zunilda Cabrera Jiménez

Experience 1999–2001 Eagle Realty Carolina, PR
Real Estate Broker

Since 2001 BC Properties Carolina, PR
Vice President

Education Nuestra Señora de los Ángeles Custodios School, R.D. 1985
Commercials Studies

Escuela de Arte Ofelia Dacosta Inc. 1989
Dramatic Arts

Ateneo Puertorriqueño 1990
Drama Principles

San Juan Board of Realtors 1998
Real Estate Broker Course (Lic. 304)

Related education

Instituto Prof. José R. Faría 2000
Regulations 10 Law Course
Ethics Regulations Course
Mathematics for Real Estates Course
Sales Techniques Course

San Juan Boards of Realtor 2002
Ethics Regulations Course
Congress Housing Course

San Juan Boards of Realtor 2004
Mortgage Financing Course
Venta de Propiedades Bajo Ley de Quiebra Course

San Juan Boards of Realtor 2005
Ventas de Propiedades Reposeidas Course

The Center for Professional Advancement
Pre Beginner's Conversational English 1

Instituto INDEPOCAHU
Crecimiento para el desarrollo humano

San Juan Boards of Realtor 2006
New apartment valuation and valuation analysis Course
Sales Techniques Course

The Center for Professional Advancement
Pre-Beginner's Conversational English II

San Juan Seminar Real Estate, Inc. 2007
Credit Score, Credit Report and How to Protect it Course

Asociación de Realtors
Computers Techniques for Real Estates Course